

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036
Tel: +1 212 556 2100
Fax: +1 212 556 2222
www.kslaw.com

Richard T. Marooney, Jr.

Direct Dial: +1 212 556 2242
rmarooney@kslaw.com

August 24, 2015

Via ECF

Honorable Joseph F. Bianco
United States District Judge
Eastern District of New York
100 Federal Plaza, Courtroom 920
Central Islip, New York 11722

Re: *Avi Cohen v. Slomin's, Inc.*, Case No. 2:15-cv-03413-JFB-SIL (E.D.N.Y.)

Dear Judge Bianco:

King & Spalding represents Defendant Slomin's, Inc. ("Slomin's") in the above-referenced matter. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rule 7.1(d), and Part I.D. of the Court's Individual Motion Practice & Rules relating to motions for extension, Slomin's respectfully requests that the Court extend the time for Slomin's to respond to Plaintiff's Complaint. Plaintiff served the Complaint on August 5, 2015, and the original due date of Slomin's response is August 26, 2015. As of the time of filing this motion, the time within which Slomin's must respond to Plaintiff's Complaint has not expired. Thus, the Federal Rules of Civil Procedure permit the Court to extend Slomin's time in which to respond to Plaintiff's Complaint. *See* Fed. R. Civ. P. 6(b)(1)(A) (permitting the parties request an extension of time before the original time expired). Slomin's asks that the Court extend Slomin's response time for forty-five (45) days, up to and including Tuesday, October 13, 2015. This is the first request for an extension of time related to Slomin's response, and Plaintiff Avi Cohen, through counsel, consents to this motion. I have attached a proposed order that would grant the requested extension.

Thank you for your consideration of this matter.

Respectfully,

/s/ Richard T. Marooney
Richard T. Marooney
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
rmarooney@kslaw.com
Telephone: 212-556-2100
Facsimile: 212-556-2222
Counsel for Defendant Slomin's, Inc.

CC via email:

Stefan Coleman (law@stefancoleman.com)
Rafey S. Balabanian (rbalabanian@edelson.com)
Benjamin H. Richman (brichman@edelson.com)
Courtney C. Booth (cbooth@edelson.com)
Jonathan R. Chally (jchally@kslaw.com)